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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BRAND LITTLE and ROBIN BURNS,
 Individually and on Behalf of All Others Similarly
 Situated,

Plaintiffs,

v.

**PACIFIC SEAFOOD PROCUREMENT, LLC;
 PACIFIC SEAFOOD PROCESSING, LLC;
 PACIFIC SEAFOOD FLEET, LLC; PACIFIC
 SEAFOOD DISTRIBUTION, LLC; PACIFIC
 SEAFOOD USA, LLC; DULCICH, INC.;
 PACIFIC SEAFOOD – EUREKA, LLC;
 PACIFIC SEAFOOD – CHARLESTON, LLC;
 PACIFIC SEAFOOD – WARRENTON, LLC;
 PACIFIC SEAFOOD – NEWPORT, LLC;
 PACIFIC SEAFOOD – BROOKINGS, LLC;
 PACIFIC SEAFOOD – WESTPORT, LLC;
 PACIFIC SURIMI – NEWPORT LLC; BLUE
 RIVER SEAFOOD, INC.; SAFE COAST
 SEAFOODS, LLC; SAFE COAST SEAFOODS
 WASHINGTON, LLC; OCEAN GOLD
 SEAFOODS, INC.; NOR-CAL SEAFOOD,
 INC.; KEVIN LEE; AMERICAN SEAFOOD
 EXP, INC.; CALIFORNIA SHELLFISH
 COMPANY, INC.; ROBERT BUGATTO
 ENTERPRISES, INC.; ALASKA ICE
 SEAFOODS, INC.; LONG FISHERIES, INC.;
 CAITO FISHERIES, INC.; CAITO
 FISHERIES, LLC; SOUTHWIND FOODS,
 LLC; FISHERMEN’S CATCH, INC.;
 GLOBAL QUALITY FOODS, INC.; GLOBAL
 QUALITY SEAFOOD LLC; OCEAN KING**

Case No. 3:23-cv-01098-AGT

**DECLARATION OF STUART G.
 GROSS IN SUPPORT OF
 PLAINTIFFS’ OPPOSITION TO
 (1) JONATHAN MARK’S
 MOTION TO QUASH
 SUBPOENA TO VERIZON
 WIRELESS (DKT. 458); (2)
 JEROD GOODIN’S MOTION TO
 QUASH SUBPOENA TO
 VERIZON WIRELESS (DKT.
 475); AND (3) JONATHAN MARK
 AND JEROD GOODIN’S
 MOTION TO QUASH
 SUBPOENA TO AT&T INC.
 (DKT. 476)**

Date: December 19, 2025
 Time: 10:00 a.m.
 Judge: Honorable Alex G. Tse
 Courtroom: A, 15th Floor

**REDACTED VERSION OF
 DOCUMENTS SOUGHT TO BE
 FILED UNDER SEAL**

**FISH INC.; BORNSTEIN SEAFOODS, INC.;
ASTORIA PACIFIC SEAFOODS, LLC; DA
YANG SEAFOOD INC.; GREAT OCEAN
SEAFOOD INC.; and DOES 32-60,**

Defendants.

GROSS KLEIN PC
THE EMBARCADERO
PIER 9, SUITE 100
SAN FRANCISCO, CA 94111

1 I, Stuart G. Gross, declare as follows:

2 1. I am a principal at Gross Klein PC and counsel for Plaintiffs. I submit this
3 declaration in support of Plaintiffs' Opposition To (1) Jonathan Mark's Motion To Quash
4 Subpoena To Verizon Wireless (Dkt. 458); (2) Jerod Goodin's Motion To Quash Subpoena To
5 Verizon Wireless (Dkt. 475); And (3) Jonathan Mark And Jerod Goodin's Motion To Quash
6 Subpoena To At&T Inc. (Dkt. 476) ("Motions to Quash"). If called as a witness, I could and
7 would truthfully testify to the following based on my personal knowledge.

8 2. Attached hereto as **Exhibit 1** is a true and correct copy of an email thread between
9 Theresa H. Rava, counsel for Jonathan Mark and Jerod Goodin, and Stuart G. Gross and
10 Raymond S. Levine, counsel for Plaintiffs, reflecting attempts to resolve Dkts. 458, 475, and 476
11 without motion practice, and agreements reached during the intervening meet and confers.

12 3. Attached hereto as **Exhibit 2** is a true and correct copy of a stipulation reached
13 with counsel for Don Alber, resolving similar concerns to those raised in Dkts. 458, 475, and 476,
14 which were a basis of meet and confers between counsel for Jonathan Mark and Jerod Goodin
15 and Plaintiffs' Counsel.

16 4. Attached hereto as **Exhibit 3** is a true and correct copy of Plaintiffs' amended
17 subpoena served on Verizon Wireless on August 22, 2025.

18 5. Attached hereto as **Exhibit 4** is a true and correct copy of Plaintiffs' subpoena
19 served on AT&T Inc. on August 6, 2025.

20 6. Attached hereto as **Exhibit 5** is a true and correct copy of documents bearing the
21 Bates Range CSF_000782-83, an extract of text messages between [REDACTED]
22 [REDACTED]

23 7. Attached hereto as **Exhibit 6** is a true and correct copy of documents bearing the
24 Baes Range FATHOM_0008022-23, an extract of text messages between [REDACTED]
25 [REDACTED]

26 8. Attached hereto as **Exhibit 7** is a true and correct copy of documents bearing the
27 Baes Range FATHOM_0008579-82, an extract of text messages between [REDACTED]
28 [REDACTED]

1 9. I have conferred with counsel for Verizon Wireless and AT&T Inc. Counsel for
2 Verizon Wireless and AT&T Inc. represented that the records each carrier would produce will
3 contain only the date of communications, the time of communications, and the phone numbers
4 involved in each communication.

5 10. Plaintiffs' counsel and counsel for Mark and Goodin conferred telephonically
6 several times on November 3 and 4, 2025 regarding this motion to quash. In the course of
7 meeting and conferring, Plaintiffs' counsel and counsel for Jonathan Mark and Jerod Goodin
8 agreed on a process of production. Verizon Wireless and AT&T Inc. would first produce the
9 subpoenaed records to counsel for Jonathan Mark and Jerod Goodin. Counsel could then review
10 and redact the production for privilege and relevance, provided that counsel enumerated which
11 portions were to be redacted, and the basis for the redactions based on privilege or relevance.
12 Counsel also agreed that the production would be presumptively designated "highly confidential"
13 under the stipulated protective order effective in this case. *See* Dkt. 63. The sole point of
14 disagreement is the timeframe of productions from Verizon Wireless and AT&T Inc.

15 I declare under the penalty of perjury under the laws of the United States of America and
16 the State of California that the foregoing is true and correct.

17
18 Executed on November 19, 2025.

19 By: /s/ Stuart G. Gross
20 STUART G. GROSS